

CSPC Pharmaceutical Group Limited

Code of Business Conduct

As an international innovative enterprise, CSPC Pharmaceutical Group Limited (hereinafter referred to as "CSPC Group", the "Company", or "we") is committed to leading by example and complying with high standards of business conduct. We have formulated and continuously improved a sound and transparent set of policies and guidelines to guide the conduct of all business activities with unified standards. This Code applies to CSPC Group and its subsidiaries (hereinafter collectively referred to as the "Group") as well as all employees (including directors, senior management, full-time employees, part-time employees, dispatched workers, and interns). This Code also serves as an important criterion for the Group when selecting partners.

I. Core Philosophy

1. **CSPC Mission** – Make good medicines, for China, and benefit the people of the world.
2. **CSPC Vision** – Lead innovation and build an outstanding CSPC.
3. **CSPC Core Values** – Openness and inclusiveness, harmony and friendliness, diligence and pragmatism, fairness and integrity, cooperation and sharing.

II. Code of Conduct

(I) Adhere to Integrity and Compliant Operation

1. Legal Compliance

Every employee has an obligation to comply with the laws and regulations of the countries and regions where the Group operates, as well as international commercial practices and recognised standards. This includes investment, trade, import and export, foreign exchange, labour, environment, contracts, consumer protection, intellectual property, accounting, and taxation. Employees must understand and comply with all laws, regulations, and rules applicable to their positions within the Group. If in doubt about the

legality of an action, employees should immediately seek advice from compliance management personnel.

2. Anti-Corruption and Commercial Bribery

CSPC Group opposes offering or accepting bribes, either directly or indirectly. The Company and its directors, senior management, employees, shareholders, and agents comply with all applicable laws relating to anti-corruption and commercial bribery.

Bribery can take many forms, including but not limited to:

- Cash, gifts, and giveaways;
- Marketable securities;
- Travel or entertainment;
- Kickbacks;
- Goods or services of any value.

The Group maintains a "zero tolerance" attitude towards any corruption and commercial bribery by any employee. All forms of bribery are strictly prohibited. Employees are required to strictly abide by the Group's regulations on gift-giving and business hospitality. Bribery in the name of donations or sponsorships is strictly prohibited, as is the payment of any so-called "facilitation fees, kickbacks, or hush money".

3. Business Gifts and Hospitality

CSPC Group employees should not offer or accept gifts and business hospitality that exceed normal value. Frequently accepting hospitality can affect an employee's objective judgement. Gifts refer not only to material items but also to services, favours, and discounts. Employees must handle various external banquets and social networking activities with caution, ensuring that the business gifts and hospitality offered or accepted are appropriate and cannot be reasonably interpreted as bribery or an improper attempt to gain an unfair advantage or violate applicable laws and regulations. Employees and their families should avoid accepting bribes or behaving in a way that raises suspicion of bribery. They must not accept any gifts that may affect their business relationship with CSPC Group. It is strictly prohibited to pay or reimburse travel expenses to exert improper

influence on a third party to obtain or retain a corporate advantage for the Group or for any other corrupt purpose.

4. Fair Competition

CSPC Group complies with fair market competition orders and applicable fair competition laws and regulations in the locations where it operates. Every employee should strive to maintain fairness in their interactions with the Group's customers, suppliers, competitors, and other employees. Employees should avoid entering into formal or informal agreements with competitors regarding pricing, production, customers, or markets. Sales strategies or arrangements with customers or suppliers that unreasonably restrict or prevent competition between competitors or customers will be deemed as attempts to harm fair competition and consumer interests, such as exclusive dealing contracts, tying or bundling, and minimum resale price agreements.

CSPC Group prohibits any competitive behaviour that violates laws and regulations, breaches commercial ethics, or disrupts market order, including but not limited to dumping at low prices, false advertising, misappropriating others' brands or improperly exploiting others' influence, damaging the reputation of competing products, infringing on others' trade secrets, and using coercive means to trade.

5. Conflict of Interest

CSPC Group prohibits employees from having any conflicts of interest with the Group. This includes, but is not limited to, holding positions in external companies without the Group's permission, conducting business between personally owned companies and CSPC Group, conflicts of interest in companies where the employee or their close relatives hold shares or positions, usurping the Group's business opportunities, and abusing the Group's resources or influence. Employees must abide by the Group's relevant regulations and are prohibited from abusing their authority to seek illegal benefits for themselves, which would cause an improper impact on the Group. The Group requires employees to fully disclose any situations that could normally be expected to cause a conflict of interest. If a situation arises that may cause a conflict between the interests of

CSPC Group and personal interests, please disclose the conflict of interest matter to the Group's regulatory department. If an employee suspects they have a conflict of interest, or a situation that could normally be perceived by others as a conflict of interest, the employee must immediately report it to the Group's regulatory department.

6. Prohibition of Insider Trading

Due to their involvement in relevant business, CSPC Group employees may become aware of or understand undisclosed insider information about CSPC Group or other companies. All departments and employees are strictly prohibited from leaking undisclosed material information of the Group to external personnel such as investors, analysts, or financial news media in any form (including but not limited to meetings, phone calls, emails, WeChat, etc.). CSPC Group employees and their families must not use this insider information to seek financial gain, including using insider information of CSPC Group or other companies to trade stocks or securities; investing under another person's name to circumvent the rules prohibiting insider trading; or disclosing insider information to other unrelated personnel, including other CSPC Group employees.

7. Trade Compliance

CSPC Group shall comply with the laws and regulations relating to export controls, economic sanctions, and anti-sanctions of China and the countries and regions applicable to its business operations. The Group establishes a sense of national security. Before providing goods, software, technology, or services externally, the Group conducts relevant trade compliance risk assessments, applies for required export authorisations or licences in accordance with the law, and ensures the compliance of transactions.

Before conducting business, all CSPC Group employees should carry out trade compliance risk assessments, including sanctions blacklist screening, in accordance with the compliance guidelines of their respective departments. If risk signals are identified, they should promptly report them according to the compliance process and conduct subsequent business in accordance with the compliance guidelines.

8. Anti-Monopoly

CSPC Group shall comply with anti-monopoly laws and regulations of China and the countries and regions applicable to its business operations to ensure fair competition with other competitors. This includes prohibiting engaging in or participating in monopoly agreements or transactions, prohibiting the abuse of a dominant market position, and prohibiting illegal concentrations of business operators.

9. Financial Integrity and Tax Compliance

CSPC Group complies with accounting systems, accounting standards, and other applicable laws and regulations relating to financial accounting and reporting. Accounting records and statements must truly and accurately reflect transaction information. Employees must prevent and promptly report the possibility of inaccurate or incomplete financial reporting.

Employees should ensure that the financial records and statements of business related to CSPC Group are accurate and reliable. They must not assist others in improperly keeping accounts or making false or misleading financial information reports; they must accurately and completely record and report all information, and must not assist anyone in recording or reporting any information that is inaccurate or likely to mislead; they must not provide advice to anyone outside CSPC Group (including customers, suppliers, or partners) on how they should record and report their own income, expenses, costs, and other assets and liabilities.

CSPC Group strictly complies with national tax policies, strictly fulfils its tax obligations in accordance with the law, truthfully reports the financial situation of the Company and its subsidiaries to the tax authorities, maintains "zero tolerance" for tax evasion, and ensures the completeness, accuracy, and authenticity of tax declaration materials. All CSPC Group employees should also strictly fulfil their personal tax obligations in accordance with the law.

The Group and its employees shall completely and comprehensively preserve the Group's financial data in accordance with the law, including but not limited to invoices, accounts, and accounting materials, to eliminate any non-compliant behaviour.

(II) Safeguard Group Assets and Rights

1. Protection of Group Assets

Assets include tangible and intangible assets and are the foundation for the Group's sustainable development. Tangible assets include factories, equipment, systems, products, materials, buildings, and supporting facilities. Intangible assets include brands, reputation, digital assets and user assets, land use rights, software systems, patent rights, trademark rights, and copyrights. The loss, theft, or misuse of assets will jeopardise the future of the Group. Employees should carefully and properly keep, use, and handle Group assets.

It is strictly prohibited to use the Group's funds or assets for any illegal or improper purpose (whether for personal gain or not). Group employees have a responsibility to protect all tangible assets, intellectual property, technical secrets, trade secrets, and other intangible assets of the Group. At the same time, they should remain vigilant against unsafe hidden dangers to Group assets. Any abnormal situations discovered should be immediately reported to the direct supervisor or the corresponding management department.

2. Data Protection

CSPC Group attaches great importance to the protection of data and information, strictly complies with relevant laws and regulations such as the Trade Secret Protection Law, Personal Data Protection Law, and Cybersecurity Law, and takes effective control measures for the information and data of customers, relevant parties, employees, and the Company. CSPC Group integrates data protection requirements into the management processes of daily business activities.

CSPC Group employees should strictly abide by the Group's data protection policies and systems as well as relevant laws and regulations. Based on business needs, they must strictly collect, process, store, and transmit data in accordance with the law, and take appropriate protective measures to prevent unauthorised use and disclosure of data and information.

When collecting and using personal information, the principles of legality, propriety, necessity, and minimisation must be followed. Consent must be obtained from the owner of the information, and the rules, methods, and scope of personal information collection and use must be explained. Personal information refers to various information that can identify a specific natural person or reflect the activities of a specific natural person, either alone or in combination with other information.

During the process of externally disclosing employees' personal information, CSPC Group shall comply with relevant legal and regulatory requirements, obtain the prior consent of the relevant personnel, disclose the relevant information in a timely, accurate, truthful, and complete manner, and keep relevant records and filings. No employee may disclose their personal information externally without authorisation.

CSPC Group shall formulate data protection manuals and guidelines, regularly communicate them to all employees, and simultaneously conduct cybersecurity assessments and optimise cybersecurity measures to ensure the Group's data security. Employees should understand the Group's data protection policies, receive Group training, must not compromise the Group's cybersecurity, and must not leak the Group's data

information.

3. Intellectual Property and Trade Secrets

CSPC Group values the creation, protection, and use of intellectual property, respects and avoids infringing upon the intellectual property of others. All employees of the Group should protect the Group's intellectual property and have a responsibility to prevent the Group's intellectual property assets from being misused. The intellectual property rights of inventions and creations developed by Group employees using Group resources during the performance of their duties belong to the Group. Third-party partners should respect CSPC Group's intellectual property rights, such as patents, trademarks, and copyrights, and comply with CSPC Group's restrictions and prohibitions on the use of its intellectual property, using CSPC Group's information and assets only for authorised specific purposes.

CSPC Group's intellectual property includes but is not limited to patents, trademarks, copyrights, trade secrets, and other information. Employees should abide by the Group's intellectual property and information security policies, protect and legally use the Group's intellectual property, and have an obligation to protect CSPC Group's trade secrets. In accordance with relevant agreements with CSPC Group, such information should be used within a reasonable scope by authorised personnel according to CSPC Group's relevant regulations. CSPC Group's trade secrets include technical information such as designs, programmes, formulas, production processes, manufacturing methods, test information, and technical know-how, as well as operational information such as overall strategic planning, functional planning for product technology and various business plans, management methods, business models, capital operations, financial information, remuneration information, business policies, resource reserves, customer information, and bidding matters.

4. Brand Reputation and External Communication

The brand is of significant strategic importance to CSPC Group and has a positive impact on all of CSPC Group's business activities. The brand value and brand assets of CSPC Group require active maintenance by every employee and relevant party. Any behaviour by anyone, in any form, that damages the brand and reputation of CSPC Group should be resolutely stopped.

CSPC Group's business activities involve government departments at all levels and their branches. CSPC Group should attach importance to mutual support and cooperation with government departments and comply with laws and regulations related to government transactions and business processing. When conducting business with the government, timely and accurate data and materials should be provided to government agencies in accordance with the law. In transactions with the government, it should be ensured that project participants understand the detailed terms of the transaction and guarantee the timely fulfilment of the terms. CSPC Group employees may not participate in political activities or express political opinions without approval, and may not accept media or public information requests, interview requests, or conduct any community activities in the name of CSPC Group or as a CSPC Group employee without authorisation.

(III) Empower Employees to Realise Their Value

The Group respects the growth needs of everyone in the enterprise, creates a positive, efficient, pragmatic, and mutually respectful working atmosphere, and helps employees unleash their personal potential and realise their self-value.

1. Health and Safety

As an enterprise that complies with laws and regulations and has a sense of social responsibility, CSPC Group is committed to providing employees with a healthy and safe working environment, continuously pursuing the maximisation of human value, striving to provide a fair and just platform, and encouraging the spirit of entrepreneurship and innovation. CSPC Group employees should actively maintain and participate in co-

creating a healthy and safe workplace. Third-party partners providing products, services, and participating in projects within CSPC Group workplaces should consciously abide by relevant national and regional laws and regulations, as well as CSPC Group's health and safety guidelines, provide health and safety training for corresponding employees, and ensure a healthy and safe working environment. We hope that employees share our philosophy and adhere to the following basic principles:

- Prohibit discrimination, retaliation, harassment, any form of abuse, and violent behaviour, including inappropriate comments, jokes, and actions;
- Guarantee fair work remuneration and benefits in accordance with local regulations and culture;
- Absolutely tolerate no human rights violations (such as forced labour or the use of child labour);
- Respect employee privacy and ensure the security of employees' personal information;
- Prohibit alcoholic beverages; alcoholic beverages may not be consumed on CSPC Group office premises;
- Prioritise business partners who share the same values as CSPC Group.

2. Harmonious Labour Relations

As an enterprise that strictly complies with Chinese labour laws and regulations as well as legal employment international treaties approved by the Chinese government, CSPC Group strictly implements legal and regulatory requirements, concludes, modifies, terminates, or dissolves labour contracts with all employees in accordance with the law, strictly follows voluntary, fair, equal, and compliant labour and employment policies, and resolutely opposes illegal and non-compliant behaviours such as forced labour and the employment of child labour.

In the process of employing staff, the Group adheres to the basic principles of voluntariness, equality, and fairness. It absolutely prohibits unequal employment based on race, ethnicity, nationality, gender, religion, or other factors. At the same time, it ensures employees' freedom of employment, and makes labour remuneration, salary, and benefits open and transparent to workers.

In terms of safeguarding employee rights and interests, the Group earnestly protects the legitimate rights and interests of employees, strictly enforces relevant labour laws and regulations as well as labour contract stipulations, pays salaries and related benefits on time and in full according to the commitments made during recruitment, fully guarantees employees' rights to leave and freedom of movement and person, provides employees with comprehensive talent training resources, and assists in employees' career development. The Group actively supports the work of trade unions, fully listens to the suggestions of trade unions and employees regarding major matters involving employees, and safeguards the legitimate rights and interests of employees.

The Group encourages employees to handle conflicts between the two parties in accordance with the law to ensure the legitimate rights and interests of both the employee and the Group. When employees believe that the Group has harmed their legitimate interests, they can report the matter to the Group's human resources or other relevant departments, insist on equal consultation, and seek solutions that reflect the interests of both parties.

(IV) Build a Harmonious, Coexistent, and Beautiful Society

Adhere to green development and innovation, provide solutions for the sustainable progress of social life, and jointly promote the harmonious coexistence of humanity, industry, and nature.

1. Environmental Protection

CSPC Group drives efficient development through scientific and technological innovation and integrates green concepts into all aspects of product research and development, manufacturing, and operational management, promoting the low-carbon transformation

of the industry and leading industry progress and change. We continuously increase investment in the research and development of green and low-carbon products, promote green and sustainable products and services, and deliver excellent products and services worldwide, helping partners achieve sustainable growth and mutual benefit, and meeting global users' needs for green and efficient kinetic energy. We are increasing the proportion of renewable energy utilisation, systematically advancing energy conservation and emission reduction, building a sustainable supply chain, and striving to achieve net-zero emissions across the value chain as early as possible. We practice a circular economy, improve resource utilisation, protect biodiversity, and promote the harmonious coexistence of the enterprise and nature.

2. Community Building

CSPC Group operates in a responsible and sustainable manner, actively preventing, reducing, and correcting any impact on the community caused by the Company's business activities. The Group attaches great importance to community demands, communicates closely with local government departments, communities, and residents, participates in community building, provides local employment opportunities, and is committed to building a long-term relationship of harmonious coexistence with the community. At the same time, the Group actively fulfils its obligations and responsibilities to the community, supporting local educational development and public welfare undertakings, and supporting community development through donations, volunteer service activities, and other means.

III. Implementation and Execution

1. Complaints and Whistleblowing

CSPC Group encourages cooperative personnel such as employees, customers, suppliers, and contractors, as well as government and regulatory authorities, to complain and report any behaviours by CSPC Group companies, departments, and employees at all levels that violate the Code of Business Conduct, such as breaches of integrity, unfair competition, and abuse of power.

Reporting Channels:

Reporting Telephone: 18931872760 (24 hours)

Reporting Email: cspcjb@cspc.cn

Reporting by Mail: To the Supervision and Security Department, CSPC Pharmaceutical Group Limited, No. 896 Zhongshan East Road, High-tech Zone, Shijiazhuang City, Hebei Province, Postal Code: 050035

If CSPC Group discovers any behaviour that violates this Code, it will accept and handle the violation according to relevant regulations based on the severity of the circumstances. The Group encourages real-name reporting, strictly keeps the personal information of the whistleblower and the content of the report confidential, sets access permissions for the reported information, and strictly prohibits leaking relevant information to the reported person and unrelated personnel. The Group prohibits any acts of threatening, striking out at, or retaliating against whistleblowers, and will provide legal support and protection to whistleblowers when necessary.

2. Training

CSPC Group regularly provides training on the content of this Code, anti-corruption, and business ethics standards for all employees to maintain a healthy, safe, and efficient working environment.

3. Audit

CSPC Group regularly audits all businesses, business ethics standards, and policies based on actual needs.

This Code has been reviewed and approved by the Board of Directors of CSPC Group and shall take effect and be implemented from the date of publication. CSPC Group reviews this Code at least once a year and promptly revises and updates it according to changes in the laws of the countries where it operates, international conventions, and other developments.

